

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

Kim L. Carpenter

DATE: JUN 12 1991

SUBJECT: Review of Draft FS for the L.E. Carpenter Site

FROM: Andrew Bellina, Chief
Hazardous Waste Facilities Branch (2AWM-HWF)

TO: Raymond Basso, Chief
New Jersey Superfund Branch II (2ERRD-NJS-II)

This is in response to your April 5, 1991 request for review comments on the Draft Feasibility Study report for the L.E. Carpenter Superfund Site located in Wharton, New Jersey. RCRA regulated wastes present at this site include xylene (F003) and ethyl benzene (F003). Comments were transmitted verbally to Jon Josephs, of your staff, on April 18, 1991. Our written comments are as follows:

1. Currently, the corrective action program is being implemented in accordance with the proposed (July 1990) Subpart S rule, to fulfill the statutory authority under 3004 (u) and (v) to require corrective action at all sites needing RCRA permits. Subpart S, while not as yet an applicable or relevant and appropriate requirement (ARAR) of the Resource Conservation and Recovery Act (RCRA), should be strongly regarded as "to be considered" (TBC) material.
2. The bis(2-ethyl hexyl) phthalate (DEHP), xylenes and ethyl benzene concentrations exceed the example concentrations meeting criteria for action levels given in proposed Subpart S for both water and soil.
3. The polychlorinated biphenyl (PCB) levels observed and reported for the site were below the 50 ppm level where the EPA Toxic Substances Control Act (TSCA) PCB regulations are applicable.
4. On Page 2-12, where ARARs are discussed, RCRA Subpart X requirements would be applicable for facilities using chemical, biological or thermal treatment technology.
5. On Page 2-21, the proposed RCRA Subpart S regulations should be added to the list of "To Be Considered" items.
6. The discussion of incineration beginning on Page 4-14 should reflect the concern over metals emission from the incineration process. The metals controls and limits in the proposed RCRA incinerator amendments would be relevant and appropriate.

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7. The discussion of low temperature thermal treatment, beginning on Page 4-17, should indicate that the RCRA Subpart X regulations would be applicable.
8. The discussion of the biological treatment technologies, beginning on Page 4-19, should reflect that the RCRA Subpart X regulations would be applicable to such processes as composting and in-situ biodegradation.
9. The discussion of granular carbon regeneration on Page 4-39 should indicate that the technical requirements of the RCRA Subpart X regulations would be applicable.
10. The discussion of steam stripping, beginning on Page 4-42, should reflect that the requirements of the RCRA Subpart X regulations would be applicable.
11. The coverage of Chemical Treatment Technologies, beginning on Page 4-44 should reflect that the RCRA Subpart X requirements would be applicable, unless the chemical reactions take place in tanks. In the latter case, the RCRA Subpart J regulations would provide the applicable requirements.

Thank you for the opportunity to comment on the L.E. Carpenter Site Feasibility Study Report. Any further comments or questions concerning this matter may be referred to Mr. John N. Brogard, P.E., of my staff, at FTS 264-8682.

cc: John Josephs, 2ERRD